

**Expertise of Steven R. Watt (Randy):**

Steven R. Watt (Randy) is the Chief of Police of the Ogden, Utah, Police Department. Chief Watt has served the citizens of the City of Ogden and the State of Utah for 35 years. During his career, he has been a Department Firearms Instructor, Defensive Tactics and Arrest Control Instructor, Officer Survival Instructor, and served extensively in the streets and in armed encounters on numerous occasions. Chief Watt served as a member, Sergeant, and Commander of the Ogden/Metro S.W.A.T. Team, serving on the team for 12 years in total. Chief Watt twice received the Department's Medal of Valor for service during SWAT incidents. Chief Watt developed significant expertise in law enforcement tactical operations and use of force, and such expertise led to involvement as an instructor for local, state, and national-level organizations, including Utah P.O.S.T., the International Association of Chiefs of Police, the National Tactical Officer's Association, the Federal Bureau of Investigation (FBI), the Drug Enforcement Agency (DEA), and the Bureau of Alcohol, Tobacco, Firearms and Explosives (BATFE, ATF).

Chief Watt is a retired Colonel in the Utah Army National Guard, with the majority of his service in the 19<sup>th</sup> Special Forces Group (Airborne). Colonel Watt was an enlisted soldier and was later Special Forces qualified as a Weapons NCO. Colonel Watt attended Officer Candidate School and was commissioned a 2<sup>nd</sup> Lieutenant, Infantry, and then later qualified as a Special Forces Officer. Colonel Watt was a Master Parachutist, a Military Free Fall Parachutist, and was an Instructor for the Special Forces Advanced Urban Combat Course. Colonel Watt served for a total of 34 years, enlisted and as an officer. Colonel Watt served three combat tours, Operation Enduring Freedom, Operation Iraqi Freedom, and Operation New Dawn. Colonel Watt's combat awards include the Combat Infantryman's Badge, the Bronze Star Medal with "V" device for Valor, and three Bronze Star Medals for meritorious service in combat.

Colonel Watt's expertise and experience in terrorism began in 1983 during attendance at the U.S. Army's Special Forces School, as counter-terrorism is one of the primary missions of the U.S. Army Special Forces. Colonel Watt returned to the Special Forces School in 1990 as an Officer and the education continued. To meet various educational requirements, Colonel Watt read books and authored papers related to Special Operations, including terrorism.

In December of 2001, then-Major Watt was mobilized with his Special Forces Company and deployed to Uzbekistan and Afghanistan as part of Task Force Dagger. During his time in Uzbekistan, Major Watt was the Isolation Facility Director, deploying Special Forces Teams on missions into Afghanistan. Major Watt intensely studied intelligence and other sources of information on Al Queda's activities so as to better prepare deploying teams for their missions.

In early, 2002, Major Watt deployed to Khowst, Afghanistan, as the Advanced Operations Base (AOB) Commander for east-central Afghanistan operations against enemy forces. Major Watt directly participated in numerous operations against Al Queda and suspected Al Queda networks. Major Watt returned from active duty in December, 2002.

In July of 2006, then-Lieutenant Colonel Watt deployed to Iraq as the Counter-Terrorism (CT) Advisor to the Iraqi National Command Center. Lieutenant Colonel Watt was responsible for helping the Iraqi senior Law Enforcement leadership develop response to terrorists and terrorist efforts at resisting Iraqi initiatives to stabilize the struggling country. Lieutenant Colonel Watt

helped the Iraqis develop national response CT doctrine, as well as develop more skilled CT forces and capabilities, directing actions against terrorist forces and units in the greater Baghdad area. Based near the Ministry of Interior, on FOB Shield, Lieutenant Colonel Watt was also the Force Protection Officer for protection of the FOB and the adjacent Baghdad Police College against terrorist attack. Lieutenant Colonel Watt and his CT Advisory Team were subjected to regular attacks by terrorist and insurgent elements. Lieutenant Colonel Watt returned from Baghdad in June, 2007.

From August of 2009 through June of 2010, Lieutenant Colonel Watt attended the U.S. Army War College at Carlisle Barracks, Pennsylvania. Lieutenant Colonel Watt attended numerous senior leadership courses, lectures, and presentations within the rigorous academic environment. Lieutenant Colonel Watt attended several courses, lectures, and presentations on terrorism during the year. Lieutenant Colonel Watt's Senior Research Project (SRP), entitled "Can the U.S. Defeat Al Queda" was written to the high academic requirements for achieving a Master's Degree in Strategic Studies, and was published by the War College. The SRP research utilized 70 source books, articles, and presentations on terrorism. While attending the War College, Lieutenant Colonel Watt was promoted to the rank of Colonel.

In July of 2010, Colonel Watt deployed to Iraq again as the J5, Strategic Plans Chief, for the Joint Forces Special Operations Component Command-Iraq (JFSOCC-I), the Joint force counter-terrorism headquarters for Iraq and the surrounding region. COL Watt was responsible for directing long-term planning against terrorist forces in Iraq and the surrounding states.

See Appendix A: Bio/CV for further details.

### **Expert Testimony Cases and Experience:**

Steven R. (Randy) Watt, hereinafter referred to as "I," has been retained in this case, U.S. v. Jany Leveille, et al., by the U.S. Attorney's Office, District of New Mexico, in the case of U.S. v. Jany Leveille et al., as an expert in terrorism and terrorist tactics, techniques, and procedures.

I was retained on July 25<sup>th</sup>, 2019, in the case of U.S. v. Brandon Charley as an expert in the use of firearms, combat dynamics, and crime scene reconstruction for the U.S. Attorney's Office, District of New Mexico as prosecutors.

I was retained on August 9<sup>th</sup>, 2018, by Robert M. Stein, Associate Attorney for the firm of Rennert, Vogel, Mandler, and Rodriguez, P.A., of Miami, Florida, as the plaintiff's expert on Active Shooter Response and School Security in preparation for litigation due to the death and injury of numerous students in a school shooting event.

I was retained on January 31<sup>st</sup>, 2018, by the U.S. Attorney's Office, District of New Mexico, in the case of U.S. v. Kirby Cleveland. The case is still ongoing.

I was retained by the Washington State Office of the Attorney General, serving as the defendant's expert in the use of force, in the case of Patrick Nelson & Colette Rapp v. Department of Corrections, et. al. The case is currently in motions.

I was retained by the Garcia Group, PLLC, of Detroit, MI, serving as the defendant's expert in

the case of *The Estate of Aiyana Stanley-Jones v. Officer Joseph Weekley, et al.*, of the Detroit Police Department. I was deposed by Plaintiff in this case, case was scheduled for trial in the City of Detroit, but was placed on hold when the Plaintiff's Attorney withdrew from the case. The case was then moved to the City Attorney's Office of the City of Detroit and was later settled.

I was retained by the Salt Lake Legal Defenders Office as a Use of Force, Firearms, advisor for defense counsel in the case preparation for the murder trial of Joseph Eugene Robinson. I provided pre-trial expert advice for Attorney Charity Shreeve on how certain firearms function.

I was retained by the City of Vancouver, Washington, in the case of *Franks v. City of Vancouver, WA*, serving as the defendant's Use of Force expert, reviewing documents and preparing to render an opinion. The case was dismissed by the court on September 13<sup>th</sup>, 2016, as plaintiffs appeared to have abandoned the suit.

I was retained by the City of Vancouver, Washington, in the case of *Andison v. City of Vancouver, WA*. I reviewed documents, and prepared and submitted a report to defense counsel. I was scheduled for deposition in Vancouver, but the case was ordered settled by the insurance provider for the City of Vancouver.

I was retained and served as the defendant's SWAT and tactical expert in the case of *Brough v. Safariland, et al.*, *St. Clair County Circuit Court Case No. 07-L-0358*. Attorney Keith Phoenix of Sandberg, Phoenix and Von Gontard, P.C., St. Louis, MO, was the lead attorney. I provided document review, analysis, and assessment, and was deposed by the plaintiff. The case was ultimately settled in August of 2011.

In 1988, I testified as a Use of Force expert in a civil case in the Salt Lake City District Court. I no longer have the details of that case. In that case, a private security guard had used a set of nunchakus to defend himself against an assault by a drunken trespasser, resulting in injury to the trespasser and giving rise to the suit.

I have testified in numerous cases during my police career, spanning everything from misdemeanor crimes to homicides. I have also provided an opinion to the prosecuting and/or reviewing attorneys in use of force cases and internal affairs investigations.

I am considered an expert in terrorism and have provided responses to the U.S. Military Commissions and U.S. Department of Justice in terrorism cases. I have given depositions in and testified in the case of *U.S. v. Khadr*, Guantanamo Bay Detention Center and Court,

Guantanamo Bay, Cuba.

**Statement of Compensation:**

I have been retained by the U.S. Attorney's Office, District of New Mexico, Albuquerque, N.M., and am being compensated at the rate of \$200.00 per hour plus expenses as required.

**Report:****Synopsis:**

Jany Leveille, a Haitian immigrant to the U.S., became the leader of a “home-grown” terrorist cell consisting of adults and youth dedicated to the furtherance of extremist objectives, namely, the coerced conversion of all people among key organizations to Jany’s version of the Islamic faith. Failure of targeted individuals within key organizations to convert would result in their murder by members of Jany’s group.

Jany, a convert to Islam, had joined with Siraj Ibn Wahhaj in a relationship both considered “marriage” while he was still legally married to his previous wife. Wahhaj had divorced his previous wife, also a member of the Islamic faith, through the Islamic tradition of telling her “I divorce you,” to which she agreed. No legal divorce had occurred. Wahhaj had previously completed the Hajj, one of the five primary pillars of Islam.

Wahhaj is the son of Siraj Latif Wahhaj, an Imam of a mosque in New York City. Wahhaj was a security guard for his father’s mosque and received security and related firearms training. Wahhaj was a student at a range facility in Georgia and his ardor in obtaining tactical firearms training caused sufficient concern with the staff for them to report Wahhaj to the FBI. He also purchased several firearms at the facility’s gun shop. Wahhaj developed enough expertise in firearms use and “tactical” training that he became the trainer for the other members of the group. Wahhaj was considered by the group to be well trained in firearms and military tactics and instructed other members of the group in firearms and military tactics, including tactical reloads, disarmament techniques, clearing buildings, rapid reloads, and hand-to-hand combat.

Traveling with Jany and Wahaj were Wahhaj’s sisters, Hujrah and Subhanah, along with Subhanah’s husband, Lucas Morton, and a combined total of 12 children of the adult group members. The Wahhaj family members are of Sunni Islamic faith. Jany had determined herself to be a prophet receiving direct revelation from God through Jibril, the Angel Gabriel. She convinced the group, particularly Wahhaj and Morton, that she was a prophet, and that she and her group would accomplish a mission directed by Allah to her through Jibril. Wahhaj believed Jany to be his and the group’s spiritual leader.

Morton had converted to Islam previously. He was susceptible to direction, through revelation, from Jany. Morton trained in firearms and tactics, and spoke of Jihad and his willingness to die in Jihad so he could reach Paradise. Jany convinced Morton that he was actually Luqman, a wise man revered in Islamic scripture and history. At one point, while in Georgia, Jany received a revelation that their home would be attacked and that Morton would die defending it. Morton expressed his willingness to die for the group.

In December, 2017, Jany and Wahhaj kidnapped Wahhaj’s disabled son, Abdul-Ghani Wahhaj, from his estranged wife, Hakima Ramzi. Jany was convinced Abdul-Ghani was her son, who had moved from her womb to Ramzi’s womb when Jany miscarried and she had convinced Wahhaj that she, not Ramzi, was the mother of the child. Abdul-Ghani needed medications to survive the serious seizures he regularly suffered from his medical disorder, Hypoxic Ischemic Encephalopathy (HIE). Jany believed that Abdul-Ghani’s disabilities were the result of

possession by evil spirits and that exorcism would relieve him of the evil spirits and, subsequently, the disabilities.

Ramzi attempted to get Abdul-Ghani back utilizing law enforcement and the courts. Jany and Wahhaj's efforts to keep Abdul-Ghani from Ramzi resulted in them traveling to other states, ultimately ending up in the Amalia, New Mexico, area.

Morton had previously purchased land in Amalia, New Mexico. The group went to Amalia, under the guidance of Jany, and built a compound to support their plans. The compound consisted of a partially sunken trailer as a home structure, earthen berms, tire walls and barriers protecting the structure and restricting access to limited points, "fighting positions" consisting of firing points and barricades from which to defend the property against attack, tunnels to hide in and pre-position firearms with ammunition, and "spider holes," from which to escape or ambush persons in the area of the compound.

The group had eleven various firearms, a piece of body armor, and a stockpile of ammunition. External and adjacent to the compound, a firing range was constructed for use in training group members in tactical assaults and firearm skills. Training sessions on the range utilized the firearms, "human" figure targets, and mobility techniques, including motorcycle mounted techniques.

Approximately two weeks after arriving in Amalia, Abdul-Ghani died, was cared for according to ritual, and then was placed in one of the tunnels. Jany received revelation that Abdul-Ghani would be resurrected in 40 days as Isa (Jesus), reveal the "truth," and signal the beginning of a key mission for Jany and her group. Jany, as spiritual leader, had received revelation that the group would go to the locations of key organizations considered corrupt, namely, the FBI, other government agencies, the military, schools, and financial organizations, and would offer them the chance to convert or be killed. The firearms and tactical training supported this plan.

Over time, Ramzi, Wahhaj, Sr., and other persons learned of the location of the group. Money had run out and the group was selling items in order to buy food and necessities. Members of the group had contacted family members asking for money, donations of food, and other items. Neighboring persons to the compound were aware of the situation and had provided some donations. The general welfare of the group was a concern and had been checked on.

On August 6<sup>th</sup>, following surveillance and investigation by several agencies, including the F.B.I., the Taos County Sheriff's Office SWAT Team served a search warrant on the compound and took the group into custody. As police approached, the adult males armed themselves and manned fighting positions, prepared to defend the compound. However, Jany ordered them to comply with law enforcement instructions.

#### Document Review and Supporting Activities:

I have reviewed and analyzed the numerous case related documents supplied to me by the U.S. Attorney's Office. I have applied my personal education, training, and experience in counter-terrorism, firearms training, counter-terrorism combat-training, and counter-terrorism combat, to this review. I have reviewed a variety of books, videos, and subject instructional materials in formulating my opinion.



Opinion:

It is my opinion, based on the previously mentioned sources and activities, that Jany Leveille and associates are a “home-grown” terrorist group who were preparing to utilize terrorism-related tactics, techniques, and procedures (TTPs), to coerce persons to accept their ideology or forfeit their lives. The terrorist TTPs and related training, as well as the planning conducted by Wahhaj in accordance with his notes on the “Phases of a Terrorist Attack,” is consistent with terrorist doctrine.

Also, it is my opinion that the “compound” constructed near Amalia, New Mexico, was constructed for the purpose of defending against persons or law enforcement agencies, including federal agencies, who would attempt to stop Jany and associates from accomplishing their goals. The below ground nature of the primary housing site, the tunnels with staged firearms, ammunition, and other items, the “channelizing” barriers and obstacles, the “fighting positions,” the berms, tire walls, and the other defensive measures are consistent with unconventional military and terrorist compound designs.

Further, it is my opinion that the type of tactical and firearms training conducted at the compound was offensive in nature and included commonly utilized mounted (motorcycle) assassination and direct support techniques to a terrorist attack. The type and nature of the training is consistent with known terrorist doctrine and TTPs.

Points in Support of Opinion:

Terrorism:

Domestic, or “home grown,” terrorism is generally defined as a form of terrorism in which the victims within a country are targeted by a perpetrator with the same citizenship as the victims. Terrorism has many varying definitions, none of which are accepted as a standard. The reality is terrorism is a tactic, not an ideology. In general terms, terrorism is an attempt to coerce change in existing geographical, geopolitical, ideological, religious, or governmental conditions through extreme violence or the threat of extreme violence. In the case of Jany and associates, the plan was to use the threat of death to convert nonbelievers to their ideology. In various statements, Jany and Wahhaj both spoke of killing those who didn’t convert.

Operational Planning:

Wahhaj had a notebook with notes explaining the “phases of a terrorist attack.” The notes are consistent with standard terrorist and counter-terrorist doctrine and TTPs. The notes could easily be used to plan an assault on a fixed location or an assassination in any environment. These notes are indicative of a desire to expand his knowledge of how to plan a terrorist operation. Wahhaj also spoke of plans to attack certain corrupt persons and places. The plans spoken of by Wahhaj and developed in accordance with the notes, are consistent with terrorist goals.

Firearms Training:

The firearms and tactical training delineated in the videos recovered as evidence in the investigation, is mostly offensive in nature. Advancing while using fire and maneuver in small

teams is an “assault” action. Withdrawing from the engagement, while utilizing fire and maneuver, is a means of coordinating the withdrawal to move on to the next tactical engagement and not expose the team to unopposed fire while withdrawing. The motorcycle training is purely offensive and is a standard terrorist method of assassination in the Middle East and Third-World nations. Both the “flat range” training and the motorcycle training are similar to, and can be viewed in, numerous AQ and other terrorist group training videos found on the internet.

#### Design and Construction of the Range:

The design and construction of the range and training facilities on the property are consistent with “flat range” training areas used by terrorists and counter-terrorist forces across the world. The “barricade” seen on the photos and videos is for the purpose of training on and rehearsing the use of cover, concealment, cornering, and final assault positioning common to offensive fire-and-maneuver drills necessary for utilizing “small-unit assault” techniques. The target array, the use of hand-drawn persons as targets, the multiple targets to be engaged simultaneously, and the distances marked out by stakes, portray a range established to train and rehearse offensive maneuvers. The open access to the target array supports open-air (sniper) training as well as mounted (vehicular) approach to the targets to facilitate mounted and/or assassination training consistent with terrorist TTPs.

#### Design of the Compound:

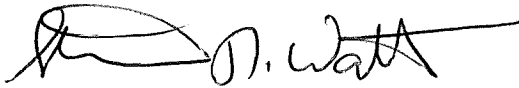
The design of the living area is based on standardized practices for designing defenses against armed attack consistent with terrorists guarding against assaults by law enforcement or military units. This strongly implies that the defendants knew their activities would be of concern to law enforcement and might stimulate law enforcement interdiction activities. The below-ground construction also creates a bunker-like structure and reduces the height requirements of the berms and tire barriers. The lower half of the trailer is well protected from direct small-arms fire, due to being below ground, while the upper half is shielded by the earthen berms and tire barriers. The presence of the tire barriers and earthen berms gives credence to the trailer being “bunkerized.” The covering over the trailer protects against inclement weather and also blocks visual access to the movement of personnel by airborne assets.

The earthen berms are a standardized defense against incoming projectiles and have been a common technique for thousands of years. In modern times, the height and width are designed to stop incoming small-arms fire, which is clearly applicable in this case. The use of tires, usually filled with sand or dirt, has become a common means of creating raised barriers which can absorb small-arms fire and protect persons and structures behind them. The overlapping nature of the barrier design ensures no gaps in protection. The combined use of the earthen berms and the tires creates 360-degree protection against small-arms fire and creates channelization of personnel attempting to enter the encampment, thus making the very few access points coverable by directed small-arms fire. The advantage in a tactical assault lies with the defender, the use of the earth/tire barriers and channelization increases the advantage.

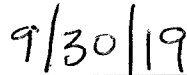
The homemade walls, as part of the barriers and barricades, are placed to block additional access and to force assaulting personnel to use the channelized approaches. Broken glass is imbedded in the walls to prevent assaulting personnel from climbing or vaulting the walls.

The use of the tunnels is consistent with insurgent and terrorist camp defenses. Tunnels offer routes of escape as well as improvised fields of fire for defending the camp by using "spider hole" access points from which terrorists can suddenly pop up and engage advancing counter-terrorist forces. The placement of key firearms near the spider hole strongly indicate this practice was in play. This also allows for armed escape by hidden routes as a counter-terrorist or law enforcement team fights its way into the camp.

In conclusion, the statements of intent, extreme Islamic ideology, firearms training and facilities, training in offensive terrorist TTPs, bunker and defensive construction of the compound, terrorism doctrinal materials, firearms and ammunition, and the planning for armed attacks on key groups of innocent persons, cause me to believe that Jany, Wahhaj, and associates are a homegrown terrorist group who intended to inflict death and fear on innocent victims in the near future, once Jany decided it was to occur.

A handwritten signature in black ink, appearing to read "S. R. Watt", written over a horizontal line.

Steven R. Watt

A handwritten date "9/30/19" in black ink, written over a horizontal line.

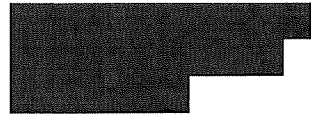
Date:



**CV and BIO OF STEVEN R. WATT**

**CURRICULUM VITAE**

Steven R. Watt



randy@srwsplops.com

**PERSONAL INFORMATION**

Date of Birth:



Citizenship: USA

Sex: Male

Marital Status: Married (39 years)

**CURRENT OCCUPATIONS**

Occupation: Chief of Police

Company: Ogden Police Department

Address: 2186 Lincoln Ave.

Ogden, UT 84401

801-629-8227

Hire Date: 12/31/16

Occupation: President/Owner

Company: SRW Special Operations Strategic and Tactical Training and Services,  
Incorporated (SRW, INC.)

Address: 3465 N. Blue Sage Rd.

Morgan, UT 84050

801-876-3867

Incorporated: 2008

**FORMER OCCUPATIONS**

Occupation: Colonel, Special Forces

Employer: Utah Army National Guard

Address: PO Box 1776

Draper, UT 84020-1776

Enlistment Date: 11/30/81

Retirement Date: 10/31/15

Occupation: Assistant Chief of Police

Employer: Ogden City Police Department

Address: 2186 Lincoln Avenue

Ogden, Utah 84401

801-629-8208

Hire Date: 08/27/79

Retirement Date: 10/15/11

EDUCATION

Degree: Master of Strategic Studies  
 University/College: U.S. Army War College (USAWC)  
 Location: Carlisle, PA  
 Graduated: 2010

Degree: Master of Business Administration  
 Location: Ogden, UT  
 University/College: University of Phoenix  
 Year: 1990

Degree: Bachelor of Police Science  
 Location: Ogden, UT  
 University/College: Weber State College  
 Year: 1980

Degree: Associate of Law Enforcement  
 University College: Lethbridge Community College  
 Location: Lethbridge, AB, Canada  
 Year: 1978

POLICE EDUCATION

12/12/1997	FBI National Academy	Quantico, VA
04/12/1990	Budgeting for Police Administration	Utah P.O.S.T., Salt Lake City, UT
12/15/89	Mid-Management Course	Utah P.O.S.T., Salt Lake City, UT
11/01/85	First Line Supervisor	Utah P.O.S.T., Salt Lake City, UT
11/04/83	Instructor Development	Utah P.O.S.T., Salt Lake City, UT

POLICE TRAINING AND CERTIFICATIONSLEADERSHIP

03/13/08	Planning/Response to Terrorism/WMD, Department of Homeland Security
02/28/06	Intro to ICS, Emergency Management Institute (FEMA)
03/31/05	National IMS, Emergency Management Institute (FEMA)
12/02/03	Risk Management, Utah Valley State College
02/21/97	Leadership Development, Countermeasures Tactical Institute
03/14/95	Conference on Workplace Violence, International Association of Chiefs of Police
09/29/93	Critical Incident Management, International Association of Chiefs of Police
03/18/93	ICS, Train-the-Trainer, Emergency Management Institute

S.W.A.T.

08/13/11	Simunitions Safety Certification Course, Scenario Instructor Course, Gunsite
11/12/98	Tactical Explosive Entry, Salt Lake County Sheriff's Office
09/04/98	Response to CBRNE Terrorism, International Association of Chiefs of Police
03/07/97	Less Lethal Weapons Instructor, International Association of Chiefs of Police
06/02/95	Tactical Leadership Development Course, Countermeasures Tactical Institute
02/11/94	Ultra S.W.A.T., International Association of Chiefs of Police

09/17/93 Aerosol Projector Instructor, Defense Technology Training Academy  
 06/28/93 L.E. Chemical Munitions, AAI Manufacturing Assembly Inc.  
 04/01/93 S.W.A.T. Supervisors Tactics and Management, International Association of  
 Chiefs of Police  
 05/04/90 Special Operations Crisis Management, Mountain States Tactical Officer's  
 Association  
 05/26/89 Tactical Hostage Rescue, Utah P.O.S.T.  
 01/28/88 Officer Survival, Utah Peace Officers Association  
 02/06/84 Tactical Police Methods, U.S. Indian Police Academy

#### FIREARMS

08/02/11 Gunsite Firearms Instructor Recertification, Gunsite  
 03/10/06 Advanced Combat Shotgun (460), Expert Rating, Gunsite Academy  
 04/22/05 Advanced Defensive Pistol (499), Expert Rating, Gunsite Academy  
 08/20/04 Basic Defensive Pistol (250), Expert Rating, Gunsite Academy  
 04/26/01 Tactical Rifle Carbine, AIS/PRISIM  
 06/07/96 Firearms Instructor Course and Certificate, Utah P.O.S.T.  
 02/09/86 Firearms Instructor Course, Countermeasures Tactical Institute  
 04/07/94 MP-5 Certification Course, International Association of Chiefs of Police  
 10/21/92 Handgun/Submachine Gun Course, Idaho Nuclear Engineering Laboratory

#### INVESTIGATIONS

12/12/97 Clinical Forensic Psychology, Federal Bureau of Investigation  
 09/16/96 Clandestine Drug Lab First Responder, Utah P.O.S.T.  
 06/12/91 Supervision of Drug Investigations, U.S. DOJ, DEA  
 06/15/91 Narcotics Investigations, Utah P.O.S.T., Utah Narcotics Officers Association  
 12/14/90 Criminal Case Analysis and Charting, Utah P.O.S.T.  
 10/25/90 Narcotics Unit Supervisors Course, W.H. Harris and Associates  
 09/21/90 Narcotics Investigator Basic Course, U.S. DOJ, DEA  
 04/03/87 Criminal Intelligence Processes, Las Vegas Metro Police Department  
 03/27/87 White Supremacist Organizations, Utah P.O.S.T.  
 05/23/86 Advanced Homicide Investigations, Utah P.O.S.T.

#### ARREST CONTROL AND DEFENSIVE TACTICS

10/09/06 Instinctive Retention and Disarming Course, Modern Warrior Institute  
 08/09/06 Tactical Ground Fighting Instructors Course, Modern Warrior Institute  
 02/17/05 Taser X26 Certification, Taser International  
 06/28/94 Arrest Control Instructor Certification, Utah P.O.S.T.  
 11/17/89 Arrest Control Instructor Course, Utah P.O.S.T.  
 11/17/89 Arrest Control Instructor Certificate, Utah P.O.S.T.  
 01/13/86 Use of Force Instructor Development Certificate, Utah P.O.S.T.  
 09/21/85 Baton Instructor Course, Koga Institute  
 06/07/85 Defensive Tactics Instructor Course, Koga Institute  
 01/18/84 Arrest Control/Patrol Tactics/Crisis Intervention Instructor, Utah P.O.S.T.

#### POLICE AWARDS

09/16/00 John A. Kolman Award of Excellence, National Tactical Officers Association  
 11/20/00 Medal of Valor, Ogden Police Department, for S.W.A.T. Operations  
 07/24/94 Medal of Merit, Ogden Police Department, for SWAT Operation  
 05/03/93 Northern Utah L.E. Officer of the Year, Utah Department of Corrections  
 11/25/91 Medal of Valor, Ogden Police Department, for S.W.A.T. Operation  
 11/25/91 Distinguished Service Award, Ogden Police Department  
 Excellent Work Awards – 14  
 Internal Letters of Appreciation/Commendation - 22  
 External Letters of Appreciation/Commendation - 9

#### MILITARY EDUCATION

06/12/10 U.S. Army War College (USAWC), Carlisle, PA  
 09/18/05 Command and General Staff Officers Course (CGSC), Ft. Leavenworth, KS  
 08/19/00 Combined Arms Service and Support School (CAS3), Gowan Field, ID  
 09/23/94 Infantry Officer Advanced Course, Ft. Benning (IOAC), GA  
 04/26/91 Special Forces Officer Qualification Course (SFQC), Ft. Bragg, NC  
 02/14/91 Infantry Officer Basic Course, Ft. Benning (IOBC), GA  
 08/26/89 Officer Candidate School (OCS), Camp W.G. Williams, UT  
 04/11/86 Primary Leadership Development Course (PLDC), Camp W.G. Williams, UT  
 09/17/84 Special Forces Weapons Sergeant Qualification Course (SFQC), Ft. Bragg, NC

#### MILITARY TRAINING AND CERTIFICATIONS

04/30/10 Combatives, Level II  
 12/15/09 Combatives, Level I  
 05/13/06 Combat Lifesaver Course, Camp W.G. Williams, UT  
 05/05/06 Instructor, Special Forces Basic Combat Course – Support, Camp W.G. Williams, UT  
 07/15/05 Instructor, Special Forces Advanced Urban Combat Course, Camp W.G. Williams, UT  
 09/08/95 Military Free Fall Parachutist Course, Yuma Proving Grounds, AZ  
 11/07/93 Fast Rope and Rappelling Master Course, Tulsa, OK  
 03/20/92 Jumpmaster Course, Ft. Benning, GA  
 06/01/82 Basic Airborne Course, Ft. Benning, GA  
 05/12/82 Chemical Operations Specialist Course, Ft. McClellan, AL  
 03/14/82 U.S. Army Basic Training, Ft. McClellan, AL

#### MILITARY COMBAT SERVICE

12/05/01 – 12/04/02 Operation Enduring Freedom, Afghanistan  
 07/15/06 – 06/27/07 Operation Iraqi Freedom, Iraq  
 06/24/10 – 06/14/11 Operation Iraqi Freedom/Operation New Dawn, Iraq

#### MILITARY AWARDS

Bronze Star w/V Device, Bronze Star Medal (3), Meritorious Service Medal (3), Army Commendation Medal (7), Army Achievement Medal (4), Army Reserve Component Achievement Medal (3), National Defense Service Medal w/Bronze Star, Iraq Campaign Medal

w/3 Stars, Afghanistan Campaign Medal w/2 Stars, Global War on Terrorism Expeditionary Medal, Global War on Terrorism Service Medal, Armed Forces Reserve Medal w/M and Hourglass Devices (3), NCO Professional Development Ribbon, Army Service Ribbon, Army Overseas Service Ribbon (3), Army Reserve Component Overseas Training Ribbon (4), Utah National Guard Recruiting Ribbon, Utah National Guard Commendation Ribbon, Utah National Guard Service Ribbon, Utah National Guard Basic Training Ribbon, Combat Infantryman's Badge, Joint Meritorious Unit Award, Military Free Fall Parachutist Badge, Master Parachutist Badge, Senior Parachutist Badge, Parachutist Badge, Canadian Parachutist Badge, Australian SAS Parachutist Badge, Royal Thailand Air Force HALO Badge, Royal Thailand Special Forces Parachutist Badge, Royal Thailand Marine Parachutist Badge, Outstanding Graduate – Officer Candidate School, SGM Mize Award/Academic Honor Graduate/Outstanding Leadership Award – Primary Leadership Development Course (PLDC), Honor Graduate (AIT), Honor Graduate (Basic Training)

#### ADDITIONAL PERSONAL CERTIFICATIONS

06/12/14	Concealed Firearm Instructor Certification, Utah Department of Public Safety
07/21/11	Concealed Firearm Instructor Certification, Utah Department of Public Safety
02/25/08	Concealed Firearm Instructor Certification, Utah Department of Public Safety
06/26/87	Rescue Diver, Professional Association of Diving Instructors (PADI)
06/21/87	Night Diver, Professional Association of Diving Instructors (PADI)
06/15/87	Search and Recovery Diver, Professional Association of Diving Instructors (PADI)
10/04/82	International Open Water Diver, Professional Association of Diving Instructors (PADI)
12/21/81	Black Belt, Wun Hop Kuen Do, Kajukenbo Association

#### BOARDS OF DIRECTORS, ADVISORY POSITIONS

3/2018 – Present	Member, Executive Board, Trapper Trails Council, BSA
6/2017 – Present	Member, Advisory Board, Utah Chapter AUSA
1/2017 – Present	Member, Board of Directors, Cottages of Hope
1/2017 – Present	Member, Board of Directors, Juvenile Justice Center
2015 – Present	Chairman of the Board of Directors, Hand In Hand Outdoors, LLC
1997 – 2010	NTOA Tactical Command Section Chair
2003 – 2009	Salvation Army Advisory Board
2003 – 2009	National Center for Shaken Baby Syndrome
1999 – 2003	Swanson Family Foundation
1999 – 2001	Co-Chair, Tactical Response Sub-Committee, Utah Olympics Committee

#### PROFESSIONAL AFFILIATIONS AND MEMBERSHIPS (CURRENT AND PAST)

##### POLICE

Technical Support Working Group (TSWG), Office of Combating Terrorism, Office of Secretary of Defense (OSD); International Association of Chiefs of Police (IACP); National Tactical Officers Association (NTOA); International Law Enforcement Educators and Trainers Association (ILEETA); Illinois Tactical Officers Association (ITOA); California Tactical Officers Association (CATO); Texas Tactical Police Officers Association (TTPOA); Mountain States Tactical Officer Association (MSTOA); Utah SWAT Association



MILITARY

Special Forces Association (SFA); American Legion; Veteran's of Foreign Wars (VFW); Wounded Warrior Project; Special Operations Warrior Foundation

ADJUNCT FACULTY POSITIONS (CURRENT AND PAST)

IAPS:	Commissioner
USAWC:	Eisenhower Program member
IACP:	SWAT, Firearms, Leadership, Terrorism, Workplace Violence
NTOA:	SWAT, Firearms, Leadership, Terrorism
Weber State University:	Criminal Justice and Law Enforcement courses
Utah P.O.S.T.:	SWAT, Firearms, Arrest Control, Patrol Tactics

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Corporate Campaign Model, SRW, Inc.  
One Warrior's Creed Logo; One Warrior's Creed; Ogden/Metro SWAT Logo; Ogden/Metro SWAT Standing Operating Procedures (SOP)

PUBLISHED WORKS

"Identifying and Combatting Organizational Leadership Toxicity," The Journal of California Law Enforcement, Volume 49, No. 2, 2015, co-authored.  
"On Leadership", Quarterly Column, Tactical Edge Magazine, NTOA, 32 issues, (2006-present)  
"Can the U.S. Defeat Al Qaeda?", USAWC Strategy Research Project, 2010  
NTOA SWAT Standards, Committee Chairman and contributor, 2009  
Ogden/Metro SWAT Policy and SOP (1991)

BIO

Steven R. Watt (Randy) is the Chief of Police of the Ogden, Utah, Police Department. Randy retired from the Ogden Police Department in Ogden, Utah, in October of 2011, while serving as an Assistant Chief of Police, having completed thirty-two years of service in a multitude of assignments and at all levels of supervision and leadership. In January of 2017, Randy was asked by City Officials to return as Chief. Chief Watt is a recipient of various medals and commendations, including the department's Medal of Valor (twice awarded). A long-time member of the Ogden/Metro S.W.A.T. Team, Chief Watt has extensive experience in tactical operations, ranging from high-risk warrant service to hostage rescues.

Chief Watt is the President of SRW, Inc., ([www.srwsplops.com](http://www.srwsplops.com)), a training and consulting business he started in 2008. SRW, Inc. provides Leadership, Business Development, Safety/Security, and Special Operations training and services to select client organizations. Past clients of SRW, Inc. include the Swanson Tactical Training Center, Presidio Group, Akirix LLC., Northern Wasatch Association of Realtors, OSS Suppressors, Accushape Armor LLC, Morgan and Weber School Districts, numerous U.S. military and law enforcement agencies, and other local and national organizations. Randy holds a Master of Strategic Studies Degree from the U.S. Army War College, a MBA from the University of Phoenix, a Bachelor of Police Science Degree from Weber State University, and is a graduate of Session 191 of the F.B.I. National Academy.

Chief Watt is a nationally recognized expert in the field of law enforcement special operations and counter-terrorism. He has been involved with projects supporting the Department of Homeland Security (DHS) and the National Institute of Justice (NIJ). He is an expert witness on Law Enforcement use of force and counter-terrorism. He is a regular contributor and speaker on Active Shooter Response for a variety of clients. He is a lead instructor for the National Tactical Officers Association (N.T.O.A.) in a variety of S.W.A.T. Leadership and Terrorism courses, and is a regular presenter at the N.T.O.A. Conference, as well as at various state S.W.A.T. Association conferences and training events. He is the past author of the "On Leadership" column for the N.T.O.A.'s Tactical Edge magazine. Prior to the 2002 Winter Olympics in Salt Lake City, Utah, then-Lieutenant Watt, was co-chair of the Tactical Response Sub-Committee and spent three years studying terrorism, writing the tactical response plan for protection of the Olympic Games, and conducting security assessments for Olympic venues. Chief Watt has taught hostage rescue tactics and techniques to foreign military and police units and is a consultant to myriad local, state and federal tactical units. He is a Commissioner for the International Academy of Public Safety and is an instructor at Gunsite Academy in Paulden, AZ.

Chief Watt has extensive military experience and retired in September, 2015, as a Colonel in the Utah Army National Guard. His last assignment was to the Joint Forces HQ, UTNG. From June, 2011, to December, 2013, he was the Commander of the 19th Special Forces Group (Airborne), commanding 2200 Special Forces soldiers located across 9 states. A Special Forces

and Infantry branched officer with thirty-four years of active duty and reserve Special Forces experience, he is a graduate of numerous Special Operations courses and schools. Randy is a Master Parachutist and Military Free-Fall Parachutist. Leadership schools include the Infantry Officer's Basic and Advanced Courses, Special Forces Qualification Course (Enlisted and Officer) Combined Arms Service and Support School, Command and General Staff Officer's Course, and the resident U.S. Army War College. COL Watt commanded at all levels of Special Forces units, ODA, Company, Battalion and Group.

Colonel Watt's combat service includes year-long tours of Afghanistan, 2001-2002, Iraq, 2006-2007, and Iraq again in 2010 through 2011. All assignments were leadership and key staff positions of counter-terrorism units. As a result of his service, he received the Bronze Star Medal with "V" device for Valor in combat, three Bronze Star Medals for meritorious service in combat, the Combat Infantryman's Badge, the G.W.O.T. Expeditionary and Service Medals, the Afghanistan Campaign Medal with two stars, the Iraq Campaign Medal with three stars, and the Joint Meritorious Unit Award. He was featured in the March, 2003, ABC television special Profiles From the Front Lines, and the August, 2003, issue of Men's Health magazine. He is the author of "One Warrior's Creed," written during the closing days of his 06-07 Iraq tour.

Expert Testimony Experience:

Steven R. (Randy) Watt, hereinafter referred to as “I,” is currently on retainer to the U.S. Attorney’s Office, Albuquerque, N.M., in the Capital Homicide case of the United States v. Kirby Cleveland as the expert on “use of force” and “officer survival tactics.”.

I am currently on retainer to the Garcia Group, PLLC, of Detroit, MI, serving as the defendant’s expert in the case of The Estate of Aiyana Stanley-Jones v. Officer Joseph Weekley, et al., of the Detroit Police Department. I was deposed by Plaintiff in this case, case was scheduled for trial in the City of Detroit, but was placed on hold when the Plaintiff’s Attorney withdrew from the case.

I was retained by the Salt Lake Legal Defenders Office as a Use of Force, Firearms, advisor for defense counsel in the case preparation for the murder trial of Joseph Eugene Robinson. I provided pre-trial expert advice for Attorney Charity Shreeve on how certain firearms function.

I was retained by the City of Vancouver, Washington, in the case of Franks v. City of Vancouver, WA, serving as the defendant’s Use of Force expert, and reviewed documents. The case was dismissed by the court on September 13<sup>th</sup>, 2016, as plaintiffs appeared to have abandoned the suit.

I was retained by the City of Vancouver, Washington, in the case of Andison v. City of Vancouver, WA. I reviewed documents, and prepared and submitted a report to defense counsel. I was scheduled for deposition in Vancouver, but the case was ordered settled by the insurance provider for the City of Vancouver.

I was retained and served as the defendant’s SWAT and tactical expert in the case of *Brough v. Safariland, et al.*, St. Clair County Circuit Court Case No. 07-L-0358. Attorney Keith Phoenix of Sandberg, Phoenix and Von Gontard, P.C., St. Louis, MO, was the lead attorney. I provided document review, analysis, and assessment, and was deposed by the plaintiff. The case was ultimately settled in August of 2011.

In 1988, I testified as a Use of Force expert in a civil case in the Salt Lake City District Court. I no longer have the details of that case. In that case, a private security guard had used a set of nunchakus to defend himself against an assault by a drunken trespasser, resulting in injury to the trespasser and giving rise to the suit.